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October 3, 1979

Secretary to the Commission
Att: Docketing and Service Section
US Nuclear Regulatory Commission
Washington, DC 20555

The following comments concerning the Draft Regulatory Guide, "Ultrasonic Testing of Reactor Vessel Welds During Inservice Inspection", are presented for your consideration:

The Consumers Power Company has been following the development of rules for the procedure to be used when examining nuclear reactor vessels using the ultrasonic inspection technique and the improvements in inspection tools used to perform required remote inspections. Indeed, Consumers Power Company has had a representative on the ASME Boiler and Pressure Vessel Code Section XI Committee from its inception almost nine years ago. In these code meetings there has been rapid progress made in no small part due to the technical and managerial contributions of the NRC representatives.

Unfortunately, this Regulatory Guide does not continue on with the existing spirit of technical cooperation between the NRC and the other ASME Boiler and Pressure Vessel Code members. Consumers Power Company has noted that many, if not all, of the technical items addressed by the Regulatory Guide have already been discussed at length and subsequently discarded (in some cases temporarily) by the Section XI Working Group on Nondestructive Examination. In these code discussions, the particular changes in ultrasonic testing procedures desired by the NRC representative have not been effectively sold based on technical merits to the remaining members of the working group. Predictably, at least two of the working group member organizations, Babcock and Wilcox and Southwest Research strongly disagree with the provisions of the draft Regulatory Guide and Consumers Power Company concurs with their positions.

Therefore, Consumers Power Company strongly recommends that this draft Regulatory Guide be withdrawn. To the extent that ultrasonic examinations can and should be upgraded for examination of reactor pressure vessel welds, Consumers Power Company suggests strongly that the NRC continue to work with the ASME Boiler and Pressure Vessel Code Committees to develop workable rules for such testing. In our mind, committee work is the most effective and rapid way to achieve workable improvements in the subject ultrasonic testing procedures, especially under circumstances where there is such a large number of substan-

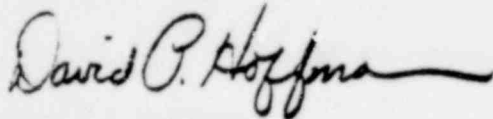
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tive, technically strong arguments against the provisions of this Regulatory Guide.

Please consider these comments in future actions concerning this guide.



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